

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. CR-18-29-SLP
)	
NAIF ABDULAZIZ M. ALFALLAJ,)	
)	
Defendant.)	

GOVERNMENT'S DISCOVERY STATUS REPORT

COMES NOW the plaintiff, United States of America, by Robert J. Troester, First Assistant United States Attorney for the Western District of Oklahoma, through Matt Dillon, Assistant United States Attorney, and submits to the Court a status of discovery by the government pursuant to Doc. No. 58.

1. "A general description, with itemization by descriptive categories, of the nature of the materials that have been produced to the Government and to Defendant, with attention specifically to the status of retrieval, processing, and production of electronically stored information:"
 - a. The government has provided discovery documents, bates numbered 1–284. This includes FBI reports concerning the investigation, witness interviews, collection of evidence,

forensic laboratory reports, photographs/photocopies of physical evidence, and travel documents.

- b. This also includes approximately 58 audio/video discs [part of the 284 “documents”] of surveillance, multiple defendant interviews, and jail calls/video visits. The videos in total are estimated to be in excess of 25 hours.
 - c. The government has a normal practice of rendering pdf documents in a manner that allows them to be easily searched. Any issues on this process should be able to be resolved between the parties.
2. “A general description, with itemization by descriptive categories, of the nature of the materials that the Government or Defendant intends to produce but has yet to produce with a statement of the intended “not later than” date of production date for each category:”
- a. FBI has classified internal reports that we are seeking declassification for, intended to be produced not later than October 5, 2018.
 - b. The government intends to produce materials collected via Grand Jury subpoena and Court Orders pursuant to 18 U.S.C. § 2703(d) not later than October 5, 2018.

3. “A statement of the date by which the Government or Defendant anticipates that its/his production of discovery materials will be substantially complete, except as to (i) materials described in Federal Rule of Criminal Procedure 16(a)(1)(F)-(G) and (ii) materials which may be generated or obtained by the Government or by Defendant after the date of the report as a result of the Government’s or Defendant’s on-going activities in the case:”
 - a. The government anticipates that our production of discovery materials will be substantially complete by October 5, 2018.
 - b. The government acknowledges its ongoing discovery obligation.

Respectfully submitted,

ROBERT J. TROESTER
First Assistant United States Attorney

s/ MATT DILLON
MATT DILLON
Assistant U.S. Attorney
Bar Number: 19321 (OK)
210 W. Park Avenue, Suite 400
Oklahoma City, Oklahoma 73102
(405)553-8700 (Office)
(405)553-8888 (Fax)
Matthew.Dillon@usdoj.gov

David C. Smith
Trial Attorney
Counterterrorism Section
National Security Division
950 Pennsylvania Ave. N.W.
Washington, DC 20530
(202) 353-3878
David.Smith5@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on September 14, 2018, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants: Michael A. Abel, Kenny R. Goza, and William H. Campbell.

s/MATT DILLON

Assistant U.S. Attorney